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Administrator
Docket Management, Room PL-401
National Highway Traffic Safety Administration
400 Seventh Street, SW., Washington, DC 20590
U.S.A.

Dear Sirs,

We, Bridgestone Corporation, would like to submit our comments on Advance notice of Proposed rulemaking [Docket No. NHTSA 2001-8677; Notice 1] on January 22, 2001.

We would appreciate it if you kindly accept our comments.

Yours sincerely,

Osamu Nishiyama
Manager,
Tire Quality Assurance Division



Below are our comments on general questions of the ANPRM (49 CFR Parts 554, 573

and 576) relating to TREAD ACT.

The words used for TREAD ACT which did not define in the "definitions" of Sec. 301.02 of

title 49 UNITED STATES CODE, PART A-GENERAL, Chapter 301 (Motor Vehicle Safety), would better be defined in this rulemaking.

Question relating to claims

1. We think that claims mean kinds of tire failure which are relating to serious

injuries or death caused by tire defects or possible tire defects.

2. We think that there is no need to inform about all claims involving serious injuries or

death, but any claims involving serious injuries or death caused by tire defects or

possible tire defects need to inform.

It is very difficult for us to determine whether or not the cause of serious injuries

or death caused by tire defect . There are so many reason such as driving speed or

drinking driver etc.

We think to inform when we can judge that the cause of serious injuries and death

derive from defective tire after detailed claims tire analysis.

Question on customer satisfaction campaigns, Etc.

1. we wish that NHTSA will define “ customer satisfaction campaigns”, “consumer advisories”, “ recalls” or “other activities involving the repair of motor vehicle equipment”.
2. We also wish that NHTSA will define “Safety recall” and “safety campaign” in SEC.3

REPORTING REQUIREMENTS (a)(1)(1) in TREAD ACT.

What’s the difference between “recall” and “safety recall to be clarified”.

We think that “safety campaign” mean “ any organized effort by an interested tire Industry stakeholder (such as tire manufacturers, trade associations , consumer groups , governments, etc.) to inform the public about care and safety of tires.

Question on customer satisfaction campaigns, Etc

1. The words “identical” can be understood as same tire size designation, same tread pattern produced by same production specification in tire industry.
2. We think that “substantially similar” in tire industry mean “ common green tire” which mean tire with different tread pattern be produced from same green tire after curing by using different curing molds.